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Attorneys for Joseph V. Womack, Trustee

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA**

In re

JOHN HENRY SCHNEIDER,

Debtor.

Case No. 14-61357

**MOTION FOR RULE 2004
EXAMINATION OF
MOYERS LAW P.C.**

Pursuant to Rule 2004, F.R.B.P., Trustee Joseph V. Womack, as Chapter 7
Trustee for the Bankruptcy Estate of John Henry Schneider, respectfully requests
the Court to order an examination as follows:

1. **Witness to be examined:** Jon Moyers
Moyers Law P.C.
490 N. 31st St., Suite 101
Billings, MT 59101
2. **Date:** May 22, 2015

3. **Time:** 2:00 p.m.
4. **Place:** Waller & Womack, P.C.
Suite 805 First Bank Building
303 North Broadway
Billings, Montana 59101
5. **Scope of examination:** To review files pertaining to Moyers Law's representation of the plaintiff in litigation against Debtor.
6. **Documents to be produced:** A copy of all depositions of Debtor, and all exhibits referenced in such depositions, in *Estate of Russell Monaco, et. al. v Harley G. Morrell, PA-C, John Schneider, Jr., M.D., et. al.*, Cause No. 13-CV-151S, United States District Court for the District of Wyoming.
7. **Time, date and place of production (if different from examination):** n/a.
8. **Movant's calculation of mileage pursuant to F.R.B.P. 2004(e):** 0.52 miles round trip from 490 N. 31st Street, Billings, MT to 303 North Broadway, Billings, MT at \$0.575 per mile for a total of \$0.30.
9. The undersigned has contacted Jon Moyers and he informs the undersigned that he requires a court order to produce the requested documents. Thus, Trustee files this motion and seeks a subpoena *duces tecum* pursuant to F.R.B.P. 9016.

DATED this 11th day of May, 2015.

GOETZ, BALDWIN & GEDDES, P.C.

By: /s/Trent M. Gardner

Trent M. Gardner/Jeffrey J. Tierney
Attorneys for Trustee Joseph V. Womack

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury that on May 11, 2015, a copy of the foregoing pleading was served (i) by electronic means pursuant to LBR 9013-1(d)(2) on the parties noted in the Court's ECF transmission facilities and/or (ii) by mail on the following parties: None.

/s/Trent M. Gardner

Trent M. Gardner
Attorneys for Trustee Joseph V.
Womack